



PROGRESS REPORT NO. 154

TO: Monica Tonel, U.S. Environmental Protection Agency (EPA) – via Email
Kathryn Cerise, EPA – via Email

FROM: Kris McCaig, Teck American Incorporated (TAI)

Cc: Denise Mills, TAI – via Email
Robert Tan, EPA – via Email

DATE: June 12, 2019

FILE NO: 01-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study
(RI/FS) - Progress Report No. 155 Month Ending May 2019

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Plant Tissue Study – On May 10, 2019, TAI submitted a redline strikeout version of the draft final Plant Tissue Study Data Summary Report (DSR) and response to EPA comments received by TAI on March 22, 2019. TAI received a letter from EPA dated May 20, 2019 with approval to finalize the DSR. At the time of writing, TAI submitted the Final DSR on to EPA and the UCR distribution list on June 12, 2019.

Soil Amendment Technology Evaluation Study (SATES) – TAI continued coordination with the SATES team and Kira Lynch, Superfund Technology Liaison with the Office of Research and Development, Office of Science and Policy during the month.

TAI submitted the draft Phase II work plan to EPA for review in March 2019, and received comments on the draft work plan from EPA and the SATES Technical Team in March and April 2019. TAI submitted a response to comments for EPA review on May 6, 2019 and received notice of no-further comments from the EPA on May 23, 2019. The Phase II work plan was finalized on May 31, 2019. Also in May, TAI shipped samples of soil amendments selected for the bench-scale testing to the Ohio State University (OSU) laboratory, with the exception of biosolids. Arrangements for biosolids are pending at the time of this writing.

In April 2019 TAI reviewed EPA's draft QAPP for the proposed RARE biochar research and submitted comments on the draft QAPP to EPA on May 6, 2019. Upon approval of the QAPP, TAI is prepared to collect additional soil matrix from test plots for the RARE study.

Baseline Ecological Risk Assessment:

Soil Toxicity Reference Values (TRVs) – TAI delivered a revised draft final Soil Approach Memo to EPA on May 7, 2019 with response to EPA comments received by TAI on April 15, 2019. TAI submitted the Final Soil Approach Memo to EPA on May 13, 2019 and a cover letter with the schedule for delivery of a draft technical memorandum with soil screening levels for metals lacking Eco-SSLs by June 28, 2019 and a draft technical memorandum documenting results of completion of Step 1 through 5 of the soil approach by July 31, 2019.

Wildlife TRVs – TAI delivered a revised Draft Final Wildlife TRV Document to EPA on May 26, 2019 in response to comments received from EPA on March 28, 2019. At the time of writing, TAI received an electronic mail message from EPA indicating that the revisions were acceptable and EPA had not further comments. TAI will finalize the document and deliver to EPA in June.

Sediment and Porewater TRVs – TAI and EPA held a Sediment and Porewater TRV workshop in Spokane on March 5-6, 2019 to work through EPA's comments on the October 2019 draft final TRV document. Follow up actions continued during the month on May.

Chemicals of Potential Concern (COPC) Refinement Document – TAI delivered a revised Draft Final COPC Refinement Document to EPA on May 31, 2019 in response to comments TAI received from EPA on April 24, 2019.

Phase 3 Sediment Study:

TAI received an electronic mail message from EPA on May 2, 2019 with approval to finalize the technical memorandum titled Draft Final Sediment Facies Maps for Upper Reach Operable Unit Areas of Interest Upper Columbia River Phase 3 Sediment Study. TAI submitted the Final Technical Memorandum on May 6, 2019.

TAI received a letter dated May 1, 2019 with EPA's compiled comments on the March 13, 2019 Draft Final Phase 3 Sediment Study Data Quality Objectives (DQOs) 2 through 5. In a letter to EPA dated May 8, 2019, TAI stated that it planned move forward with the quality assurance project plan (QAPP) and that revisions to the DQOs be incorporated directly into the QAPP, to be submitted to EPA for review on June 17, 2019. EPA's response letter, dated May 23, 2019, provided detailed expectations for analytical approaches and sampling designs to be included in the revised DQOs and draft QAPP in order for the documents to be approved in time for the 2019 field season. TAI and EPA discussed the expectations and changes to the documents during a June 6, 2019 teleconference.

TAI and EPA continued to coordinate on planning for the remaining Phase 3 Sediment Study Facies Mapping field work in 2019 during the month of May.

Human Health Risk Assessment (HHRA):

TAI received an electronic mail message from EPA on May 6, 2019 in response to TAI's March 4, 2019 electronic mail message requesting the datasets that SRC used to generate tables and figures in the Draft Final Recreational Use Survey Data Analysis Report (DAR). TAI delivered comments on the draft final DAR to EPA on May 17, 2019.

A meeting was held between EPA and TAI on May 15, 2019 to discuss TAI comments on the Rec Use Survey and Tribal Use Survey DARs, and TAI's preliminary comments on the Draft Upland Baseline HHRA.

At the time of writing, TAI delivered comments on the Draft Upland Baseline HHRA to EPA on June 5, 2019.

Data Management Plan – TAI received a letter from EPA on May 6, 2019 approving the Revised Draft Final Data Management Plan as long as TAI incorporated the changes specified in the table attached to the letter. At the time of writing, TAI delivered the Final Data Management Plan Addendum No. 1 to EPA on June 5, 2019.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4501.